

Nebraska National Forest
Attention: 2007 Prairie Dog DEIS Comments
125 North Main Street
Chadron, NE 69337

Re: Nebraska and South Dakota Black-tailed Prairie Dog
Management
on the Nebraska National Forest and Associated Units Draft Environmental
Impact Statement

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the Environmental Protection Agency (EPA) has reviewed the above referenced DEIS. This DEIS was assigned a Council on Environmental Quality (CEQ) file number 20070229. Based upon our review, EPA has rated the DEIS as "LO" (Lack of Objections). However, we do have several suggestions (see attached) for improvement to the Final EIS to ensure that the public is fully informed of the environmental consequences of the policy being considered, and that all environmental impacts are considered.

If you have any additional questions, please contact Stephen Smith at (913) 551-7656.

Sincerely,

Joseph Cothorn
NEPA Team Leader
Environmental Services Division

**USEPA Comments to the Nebraska and South Dakota Black-tailed Prairie
Dog Management on the Nebraska National Forest and Associated Units
Draft Environmental Impact Statement**

The Need for the Project:

EPA recommends that the purpose and need be strengthened to offer a more complete explanation of why the agency is considering an action and what the agency objectives are.

The Need Statement from the document on page 1-3 states, “These actions are necessitated by several factors. The reduction in forage exacerbated by the ongoing drought has impacted the habitat quality in these areas. Recent inventories have shown that prairie dog colonies continue to expand and encroach on to private land despite the use of rodenticide within the BMZ of the encroaching colonies.” This statement is vague, and should be rewritten to better convey the needs that are described throughout the body of the document.

Prairie dog acreage has expanded beyond the desired total quantity and this condition is interfering with other desired land uses as described in the Forest Plan. the fact that prairie dog acreage is impeding the use of National Grassland as leased grazing acreage, the fact that prairie dog growth has not been balanced between counties as desired, as well as the risk that prairie dog colonies pose to adjacent private land

Preferred Alternative:

The DEIS does not recommend a USFS preferred alternative or environmentally preferred alternative. The Final EIS (FEIS) must provide a preferred alternative, and the Record of Decision (ROD) should provide a clear explanation of why the preferred alternative was selected, and if it is not the environmentally preferred alternative why it was chosen over the environmentally preferred alternative. This would provide the decision makers, reviewing agencies and public a clear understanding of the USFS’s thinking on prairie dog management, along with the how the USFS will be addressing multiple resource management needs and desires in the National Grasslands.

Economic Impacts:

From our review of the DEIS, EPA believes that Alternative 5 - “Adaptive Management with Historical Occupancy Emphasis” would be the environmentally preferred alternative that could fulfill the purpose and need of the EIS and assure the protection and sustainability of the black-footed ferret. This alternative would reduce forage for livestock, thereby increasing the likelihood of the USFS to reallocate grazing on the National Grasslands. This may have some economic impacts, however, in reading the “Social and Economics Factors Section, Chapter 3 it is difficult to determine if the economic impact would be significant. It would be helpful for the FEIS to provide a more detailed economic study that would look at long-term trends as prairie dog colonies expand.

Global Warming and Changing Ecological Conditions:

This study should also consider climatic impacts of global warming in addressing ecological changes to both the vegetation and water availability. This recommendation follows the rationale of the discussion on page 3-8, Cumulative Effects, last paragraph, “The drought and livestock grazing would tend to increase the acreage in prairie dog colonies....” And on page 3-19, “There will be cumulative impacts to vegetation condition and forage production from past, present and reasonable foreseeable drought events associated with prairie dog colonies.”

Ecological Risk:

General Comments:

Prairie dog towns (coterries) are ecosystems in and of themselves. The prairie dog ecosystem supports at least 170 species, including the endangered black-footed ferret (whose diet is almost 100% prairie dog), hawks, eagles, mountain plovers, burrowing owls, other owls, coyotes, badgers, bobcats, foxes, and a host of reptiles (USFWS 1998).

The purpose of the proposed action is to manage prairie dog colonies in the Interior Management Zones of National Grasslands in an adaptive fashion. To achieve prairie dog management objectives, the use of rodenticide (zinc phosphide) is included in all proposed alternatives to varying degrees. Alternative 2 (the no action alternative and current forest plan direction), would achieve prairie-dog population regulation and management through non-lethal methods and limit rodenticide use to situations in which human health and safety or infrastructure are threatened. Alternative 5 would limit the use of rodenticide to situations in which prairie dog populations are exceeding historical occupancy levels of 10 to 20 percent of the landscape. From an ecological risk perspective, the limited use of rodenticide, as outlined in Alternatives 2 and 5, is recommended.

The EIS describes the environmental consequences of the use of zinc phosphide. Direct effects include the poisoning of non-target birds and mammals, as well as secondary poisoning to species that consume the intestinal tract of dead prairie dogs. These species include black-ferrets, bald eagles, swift foxes, northern harriers, ferruginous hawks, shot-eared owls, and burrowing owls.

The use of zinc phosphide on black-tailed prairie dog colonies, within the Nebraska National Forest and its Associated Units, places an unknown risk to target and non-target species. Therefore, limited use is recommended in National Grasslands. Further prairie dog control on private property is routine, with an estimated 732,000 acres of prairie dogs treated with rodenticide in 2006 alone. Non-lethal methods, such as vegetation management through livestock grazing modifications, are recommended as alternatives to the use of rodenticides to reduce overall ecological risk.

Table 2-8: page 2-10. This table discusses the thresholds for rodenticide use in Alternative 4. It is difficult to understand the plan for rodenticide use when prairie dog acreage is between 8,000-11,000 acres; the first threshold implies rodenticide will be used to limit acreage to 11,000 acres, and the second threshold implies rodenticide will be used with as few as 8,000 acres.